

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BARBARA BRUNO and JOSEPH BRUNO,

Plaintiffs,

-against-

ZIMMER, INC., et al.,

Defendants.

CV 15-6129 (LDW) (AKT)

**NOTICE MOTION FOR LEAVE TO AMEND PLAINTIFFS' SECOND AMENDED
COMPLAINT PURSUANT TO F.R.C.P. 15**

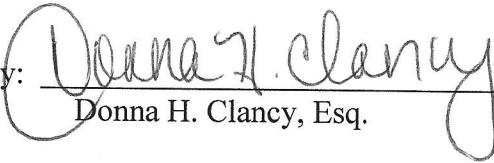
PLEASE TAKE NOTICE that on a date and at a time to be designed by the Court, at the Courthouse for the United States District Court for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722, Plaintiffs will move the Court for Leave to Amend the First Amended Complaint (Dkt. No. 605904/2015)¹ pursuant to Fed. R. Civ. P. 15. This Motion is based on this Notice of Motion and Motion; Memorandum of Law in Support of this Motion and exhibits attached thereto; the pleadings, records, and files in this action; and such other and further evidence and argument as may be presented at the time of the hearing.

¹ Plaintiffs' were granted leave to file a motion to amend. *See* Dkt. No. 53.

Dated: September 21, 2016

Respectfully submitted,

CLANCY LAW FIRM, P.C.

By: _____
Donna H. Clancy, Esq.

Donna H. Clancy, Esq.
The Clancy Law Firm, P.C.
40 Wall St., 29th Fl.
New York, NY 10005
T: 212-747-1744
F: 646-205-3956

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: _____
Wendy R. Fleishman

Wendy R. Fleishman
Kelly McNabb
Lieff Cabraser Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, New York 10013-1413
Telephone: 212.355.9500
Facsimile: 212.355.9592

Attorneys for Plaintiffs
BARBARA BRUNO and JOSEPH BRUNO